

Public Involvement Scoping Summary Report

Plan Amendment and Environmental Assessment for Updating Bat Conservation Practices in the Ozark-St. Francis National Forests

July 2019

This report summarizes public involvement and comments received by the U.S. Forest Service (Forest Service) during the public scoping process for the Revised Land and Resource Management Plan (Forest Plan) Amendment and Environmental Assessment (EA) for Updating Bat Conservation Practices in the Ozark-St. Francis National Forests.

The purpose of these public involvement activities was to notify, inform and involve the public, organizations, government agencies, elected officials, and federally-recognized Native American tribes in identifying issues to be addressed in the Plan Amendment and associated EA. Public notification and involvement efforts were conducted in accordance with the National Environmental Policy Act (NEPA) and Forest Service directives and procedures.

Summary of Activities Conducted During the Scoping Period

Notification Activities: Notifications were developed to inform the public of the Forest Service's intent to prepare a Forest Plan Amendment and EA associated with the Proposed Action and provide information on how to be involved in the project and planning process. The following specific notifications were developed and released:

- **Stakeholder Letter:** A stakeholder notification letter was mailed to 1,171 individuals, groups, agencies, and organizations on April 15, 2019. The stakeholder notification letters included Forest Service point of contact information for additional information and questions, and provided the project web site.
- **Tribal and State Historic Preservation Office Notification Letters:** Personalized tribal and State Historic Preservation Office (SHPO) notification letters were mailed to 16 tribal and organization staff members on April 15, 2019. The notification letters included Forest Service point of contact information for additional information and questions, and provided the project web site.
- **Newspaper advertisements:** Newspaper legal notices were placed in four separate newspapers throughout the Forests for public information. The notices were published on the following schedule:
 - *The Courier*, Russellville, Arkansas – April 14, 2019
 - *Johnson County Graphic*, Clarksville, Arkansas – April 17, 2019
 - *Southwest Times Record*, Fort Smith, Arkansas – April 14, 2019
 - *Stone County Leader*, Mountain View, Arkansas – April 17, 2019

- Press Release: A press release was sent out by the Ozark- St. Francis and Ouachita National Forests' Public Affairs Office to local and regional media outlets on April 16, 2019.
- Email Communication: A mass email was sent out via GOVDelivery to an electronic mailing list of 365 subscribers. The email included project web site information and included Forest Service point of contact information for additional information and questions on the project.
- Public Web Site: Project information was posted to the public project web site at the beginning of the scoping period, hosted on the Ozark-St. Francis National Forests' website. This website is what the public is directed to for additional project information. Individuals can sign up for email notifications to receive updates when new items are posted to the website. The website also has an electronic comment form feature, which allows members of the public to fill in an electronic form. Once submitted, the form goes directly to the project team via the Comment Analysis and Response Application (CARA) system as a project comment.
- Public Open-House Style Meetings: Two in-person public meetings were held on May 3, 2019, from 2pm to 5pm, and on May 4, 2019, from 10am to 1pm. The meetings were held in a large conference room, and were held as an open-house style poster session with multiple posters and maps for discussions and reference. Attendance at the sessions was:
 - Friday, May 3: Four individuals attended and one individual attended representing an organization, five total attendees.
 - Saturday, May 4: Five individuals attended the meeting.
- Meeting Presentation Information: At the public open-house meetings, six posters were developed for sharing information on the project and Forest Service monitoring information. The posters were then placed on the project web site for electronic access for interested persons. These six posters included the following topics:
 - Bats of Conservation Focus on the Ozark-St. Francis National Forests: Life History
 - Forest Management and Bats on the Ozark-St. Francis National Forests
 - Bat Mist Netting from 2006 to 2018 with Indiana Bat Capture Locations
 - Collaborative Partnership: Indiana Bat Female Migrations
 - Sylamore Ranger District Indiana Bat Adaptive Management Project
 - National Environmental Policy Act and National Forest Management Act Processes

Summary of Public Comments and Responses

This section is intended to summarize feedback heard from the public during the scoping period; it is not meant to capture all aspects of the comments or to serve as a legal record.

The Forest Service received 26 comments during the scoping period on the Plan Amendment and EA from April 14, 2019 to May 14, 2019. Two comments were submitted on the project website, eight comments were received by postal mail, and 16 comments were submitted by email.

Comment Category #1: Multiple comments were received relating to the Ozark Highlands Trail and management of this area. Multiple commenters specifically requested the Forest Service maintain canopy closure and avoid tree thinning in the Ozark Highlands Trail area to ensure trail maintenance can be conducted and the trail can be kept in good condition. Many comments requested we consider effects to the Ozark Highlands Trail corridor related to this project.

- EA and Forest Plan Amendment approach: The proposed Forest Plan Amendment will not impact or change the protection measures that exist for the Ozark Highlands Trail Management Area (MA) 2.A as described in the Forest Plan. The description of the Forest Plan management strategy of the Ozark Highlands Trail corridor MA 2.A is found on page 2-47 and the standards start on page 3-29. Proposed changes to the Forest Plan related to this amendment do not include any MA 2.A management strategy or standards, therefore no effects to the Ozark Highlands Trail corridor MA 2.A are expected related to this Plan Amendment and EA.

Comment Category #2: Another comment theme had to do with private property rights. Multiple commenters were concerned about Forest Service management activities on their private property that shared one or more boundaries with Forest Service property.

- EA and Forest Plan Amendment approach: The Forest Plan only addresses forest management activities on Forest Service property, as that is the only land that the Forest Service has authority to manage. No forest management activities can or would be conducted on private property either within or adjacent to the Proclamation Boundary lines under the Forest Plan or this Plan Amendment and EA.

Comment Category #3: One comment theme discusses seeing a shift in Forest management efforts for all native species and game species (wild turkey, bobwhite quail in Arkansas) to management efforts for non-consumptive species (threatened and endangered species) and users, and provides the example of extensive mid-story habitat removal. Commenter also notes that any Forest Plan amendment must address positive and negative impacts on all native species that exist in the Forest ecosystem.

- EA and Forest Plan Amendment approach: All necessary analysis for this Forest Plan Amendment and EA will address the direct, indirect and cumulative effects from the

Proposed Action for the Ozark-St. Francis National Forests. The proposed changes to Forest-Wide Standards related to threatened and endangered bats will not change existing Forest Plan management guidance and standards for managing native and game species in the Ozark-St. Francis National Forests, but the interaction of the two strategies will be analyzed as warranted in the Forest Plan Amendment and EA.

Comment Category #4: Another comment theme reflected general dissatisfaction with the Forest Plan in general, and Forest Service management of the Forest, in particular timber harvest, on a long-term scale.

- EA and Plan Amendment approach: The existing Forest Plan has been in effect since 2005. Timber harvest, salvage and thinning are important components to a diverse, healthy forest environment. We manage the Forest in accordance with Forest Service policy and in collaboration with our partners and stakeholders to satisfy a multitude of user groups and maintain a number of sustainable uses. This amendment would not alter the amount of timber harvest expected to occur, but could alter the timing and in some limited circumstances, the location of timber harvest and other forest management activities.

Comment Category #5: One comment theme asks that we not change the Forest Plan without much more study of flora and fauna and asks to manage smaller areas. This included recommendations to more thoroughly study bats on the Forests, and to increase buffer zones around maternity sites to 1,000 feet or more.

- EA and Forest Plan Amendment approach: Forest management takes into account the vast amount of information available on flora and fauna that make up the Ozark-St. Francis National Forests. The Forests have a robust monitoring program to watch trends and enable management shifts to accommodate any changes we see on the ground for a myriad of factors. For this project, specific protections for threatened and endangered bats on the Ozark-St. Francis National Forests will be developed in conjunction with US Fish and Wildlife Service. These proposed new and revised bat conservation measures will be consulted on with U.S. Fish and Wildlife Service for their concurrence on our land management efforts. This analysis will also be the focus of the EA analysis that reflects recent and best available science.

Comment Category #6: Another comment theme relates to monitoring and biological research occurring on the Forests, and how this information is biased by the outcome the Forest Service desires.

- EA and Forest Plan Amendment approach: Data quality is an important aspect of our research and monitoring, and we strive to gather necessary and comprehensive information to the best of our ability. Every effort is made to incorporate independently-conducted and peer-reviewed science, and to analyze our monitoring

results in an unbiased manner to help guide future management. Our Forest Monitoring and Evaluation Reports detailing Ozark-St. Francis National Forests' monitoring efforts can be found on our Forest web site.

Comment Category #7: This theme included various comments about providing alternative approaches to amending the Forest Plan, and also discussed alternatives as they relate to the Proposed Action.

- EA and Forest Plan Amendment approach: Alternatives are always considered as a part of the NEPA process. The EA will include a section on alternatives developed and considered to accomplish the stated purpose and need.

Comment Category #8: Some commenters stated that there was no specific information provided in scoping relating to the actual proposed wording of changes to Forest Plan standards, and therefore they could not provide detailed comments at this time.

- EA and Forest Plan Amendment approach: During scoping of a NEPA document, the Forest Service is gathering information to frame and further develop the Proposed Action and potential alternatives. There is typically less information available at this stage than at any other part of the NEPA public involvement process. Additional project-specific information will be made available to the public as the project progresses via the project website and public information releases, including the Draft EA and Forest Plan Amendment.

Comment Category #9: Another comment theme related to cave protections proposed for threatened and endangered bats and cave gates. Comments included recommendations for better cave gates on easily accessible caves. Comments also discussed buffer zones around caves, including how these buffers are not adequate in terms of size and do not protect the cave itself. Comments also included identification of roost locations in caves and restricting disturbance activities, including research efforts.

- EA and Plan Amendment approach: Additional cave and bat protections will be considered as they relate to this project and conservation measures updated as a part of our consultation with U.S. Fish and Wildlife Service. These will be documented as a result of this consultation, and also in the EA and Plan Amendment.

Comment Category #10: Another comment theme included specific comments and recommendations for a local cave in Indiana bat habitat on the Ozark-St. Francis National Forests. Recommendations also included specific restoration comments for shagbark hickory and pine stands in support of Indiana bat habitat in these areas.

- EA and Forest Plan Amendment approach: As this is a forest-wide Forest Plan Amendment, any changes to identified conservation measures for threatened and endangered bat species would apply to all areas, including both caves and trees, which

could be potential bat habitats. These will be considered in the U.S. Fish and Wildlife Service consultation for this project, and the EA and Forest Plan Amendment.